Lindsay D. Steele SBOT No. 24070673 Steele Law Firm, PLLC 3629 Lovell Avenue, Suite 100 Fort Worth, TX 76107 Isteele@steelebankruptcy.com 682.231.0909 Phone 866.292.2348 Fax

ATTORNEY FOR DEBTORS

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:	§	
	§	CASE NO. 17-40738-MXM13
JESUS HECTOR VALDES &	§	
ELEASCIA FOSTER VALDES,	§	CHAPTER 13
DEBTORS.	§	

<u>DEBTORS CERTIFICATION AND</u> MOTION FOR ENTRY OF CHAPTER 13 DISCHARGE

NOTICE

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT: 501 W 10TH STREET FORT WORTH, TX 76102 BEFORE 4:00PM ON MARCH 22, 2022 WHICH IS TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE FILED WITH THE CLERK OF THE COURT, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE TO (1) ANY PERSON TO WHOM THE DEBTOR HAS BEEN ORDERED TO PAY SUPPORT (EITHER SPOUSAL SUPPORT OR CHILD SUPPORT), (2) THE CHAPTER 13 TRUSTEE, (3) THE UNITED STATES TRUSTEE, AND (4) ALL CREDITORS.

IF NO RESPONSE IS TIMELY FILED OR NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT.

TO THE HONORABLE JUDGE OF THIS COURT:

Jesus Hector Valdes and Eleascia Foster Valdes (hereafter "Mr. & Mrs. Valdes") files this Certification and Motion for Entry of Chapter 13 Discharge (hereafter "the Motion") and shows:

- 1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §157 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
- 2. Mr. & Mrs. Valdes filed their petition in bankruptcy under Chapter 13 on February 27, 2017.
- 3. Pursuant to 11 U.S.C. § 1328(a) of the Bankruptcy Code, Mr. & Mrs. Valdes move for entry of discharge.
- 4. By signing below, Mr. & Mrs. Valdes certify under penalty of perjury under the laws of the United States of America that the following statements are true and correct:
- 5. We have completed the personal financial management course from an agency approved by the United States Trustee. A copy of Official Form 23 is attached hereto as "Exhibit A".
- 6. If we owe a debt arising from (1) any violation of any state or federal securities laws, regulations or orders; (2) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security; (3) a civil remedy under §1964 of title 13; or (4) a criminal act, intentional tort or willful reckless misconduct that caused a serious physical injury or death to another individual in the preceding five years, then I have not claimed an exemption for my residence in an amount in excess of \$125,000.00.
- 7. All amounts payable by me on a domestic support obligation, that are due through this date (including amounts due before the petition was filed in this case, but only to the extent provided for by the plan) have been paid.

8. We have not received a discharge in a case filed under Chapter 7, 11, or 12 of the Bankruptcy Code during the four-year period before the date that my petition was filed in this case.

9. We have not received a discharge in a case filed under Chapter 13 of the Bankruptcy Code during the two-year period before the date that my petition was filed in this case.

10. No criminal proceeding is pending against us alleging that we are guilty of a felony.

11. No Civil case is pending against us alleging that we are liable for any (1) violation of the Federal securities laws, and State securities law, or any regulation or order issued under Federal securities laws or State securities laws; (2) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security; (3) civil remedy under § 1964 of title 18; or (4) criminal act, intentional tort, or willful or reckless misconduct that caused serious physical injury or death to another individual in the preceding five years.

12. We have made all payments required by our confirmed Chapter 13 Plan.

Dated:

d: 2 28 2022

Signed: /s/

Jesus Hector Valdes

Signed:

Eleascia Foster Valdes

Respectfully Submitted,

By: /s/ Lindsay D. Steele Lindsay D. Steele SBOT No. 24070673 Steele Law Firm, PLLC 3629 Lovell Avenue, Suite 100 Fort Worth, TX 76107 Isteele@steelebankruptcy.com 682.231.0909 Phone 866.292.2348 Fax

ATTONREY FOR DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on <u>February 28, 2022</u>, a true and correct copy of the foregoing was served on all parties listed below and on the attached mailing matrix by first class mail or via electronic notice.

By Electronic Means and/or US First Class Mail:

DEBTORS:

Mr. & Mrs. Valdes (email)

STANDING CHAPTER 13 TRUSTEE:

Tim Truman 6851 N.E. Loop 820, Suite 300 North Richland Hills, TX 76180

U.S. TRUSTEE

1100 Commerce Street Rm. 960 Dallas, TX 75242

CREDITOR MATRIX

/s/ Lindsay D. Steele Lindsay D. Steele ATTORNEY FOR DEBTOR